

## **Exhibit F**

**Penelope Bastidas**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
PENELOPE BASTIDAS**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF QUEENS     )

PENELOPE BASTIDAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 57-15 73<sup>rd</sup> Place, Maspeth, New York 11378.

2. I am currently 60 years old, having been born on May 13, 1962.

3. I am the wife of Mario Bastidas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from colon cancer on April 1, 2017, at the age of 55. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband Mario and I had a beautiful relationship. There was nothing we didn't do together, from washing dishes to taking care of our three puppies. In addition to taking care of our responsibilities together, we were a very active couple. We biked and went to the gym every day. Mario was the life of the party, and everyone loved him. I'm from a very large family who live in Ecuador. When we're all together, it's more than 20 people. You can

imagine how difficult it is to get all of us together in the same room, or how hectic and loud it can get when we are. You know who took charge of getting all my family together in Ecuador? It was Mario. He started a tradition where we go around the table and every person had a chance to talk, to say whatever they wanted. It doesn't matter if it was a happy story or a sad story. We went through every single person. He was the same way with his family, but with my family, it was a big production, and he loved it. He was "Uncle Mario," ready to do anything.

6. My husband worked as a paramedic for the New York City Fire Department. He was working on September 11, 2001, as part of the rescue and recovery efforts at Ground Zero. Mario made it home alive, but his colleague, Carlito, died that day. He and Mario were very close friends, and I was close with Carlito's wife, now widow. Mario did not stop working until they found Carlito's body. That was in May 2002. Whenever Mario came home from work, he was covered with dust and debris. Despite that horrific time, Mario and I were blessed to be able to continue our lives together.

7. In May of 2011, Mario noticed he was bleeding from his rectum. He didn't think it was anything serious. Luckily, Mario was due for his annual FDNY health exam. I made sure the doctors knew about the bleeding. I was also suspicious because Mario had lost a noticeable amount of weight. We are very health and fitness conscious. Mario was very muscular and wasn't losing weight intentionally. The exam revealed he had lost 20 pounds. I demanded the doctors send Mario to specialist for a colonoscopy or endoscopy, which they did. The specialist said he would call us when the results were back. It usually took a week. But we got a call right away. They didn't give us results on the phone. They wanted us to see the doctor as soon as possible. There, the doctor gave us the horrible news. Mario had colon cancer. From that day on, it was a nightmare.

8. Mario had surgery to remove part of his colon. The doctors said the cancer had spread to his lymph nodes and needed to be treated with chemotherapy. The doctors were very kind, they explained all the treatments and options to us. He wanted aggressive treatment. He was having two different kinds of chemotherapy—one had to be administered at the hospital. The other was portable, and he would go to work while also having the drugs pumping through him. Even though he was nauseous and dizzy, Mario absolutely refused to stop working.

9. Learning about his diagnosis was devastating. I loved this man so much. We already knew that the cancer had spread to the lymph nodes. I tried to be optimistic, but, at the



time, I worked as a telemetry nurse. I used to love my job. Both Mario and I were proud that our work helped other people. I loved helping people. After Mario died, I couldn't continue working with terminal or gravely ill patients. I would break down. Everything reminded me of Mario. Only recently have I started working part time, but my patients have emotional or mental problems, not physical. These are people in crisis, who need my help. It doesn't bring me joy. Nothing does. I go through life like a Zombie, now. I get through each day because I have to honor Mario's legacy of helping people. He's been gone five years, and I still see Mario everywhere. Any place I go, everything I do, anyone I meet, I find something that reminds me of Mario. Just recently, I was doing a fundraiser for autistic children. A boy had on a red t-shirt that said, "Super-Mario". I know it's from a videogame, but that's what Mario's friends nicknamed him, "Super Mario." Because he never stopped. He could do anything.

10. The chemotherapy did not stop the cancer, and Mario's pain became much worse. We thought the chemo would give him some relief. The doctors found a small tumor hiding near his prostate, which was causing this new pain. The cancer had spread to his bladder. The doctors said they were trying, but now the cancer has spread. We would talk about the different therapies and how he wanted to proceed. Mario would try any treatments they offered to him. The only option was radiation treatments. Doctors were not optimistic and warned that the pain and weight loss would continue to worsen. It did.

11. My husband would try to fight through the pain, but I would hear him crying. He didn't want to admit that he couldn't work like he used to. The FDNY offered to give him a job at headquarters, doing lighter work, but he wouldn't hear of it. All I wanted was to take the pain away from him, to put it on me. He said he was "embracing the pain," because he had to prolong his life, so I wouldn't be alone. All he wanted was to live longer so I wouldn't be alone. He was so worried about taking care of his wife, making sure I would be provided for. I didn't want him to die. I wanted to die instead of him. But staying alive meant agonizing physical pain.

12. In 2016, we went to Ecuador to try holistic medicine. They use plants and herbs to try and heal the cancer. We used to blend it up for him to drink. We tried. We tried everything. It didn't work. When we returned to New York, he was in and out of the hospital. In addition to the pain and weight loss, a blood-clot in his legs caused extreme swelling, and he couldn't walk. When he spoke, I could barely hear him. Mario became incontinent and needed to wear diapers. He suffered terrible fevers. He was a strong, muscular man, who was slipping away. He was skin

and bones, no muscles, couldn't do anything for himself. He had a port put into his chest that administered his medication. He had wires everywhere and a colonoscopy bag. He'd look at himself in the mirror and say, "Look at me now, baby. How can you still love me like this?" I told him I would always love him and that I wish I could die with him, but he'd say it wasn't my time yet.

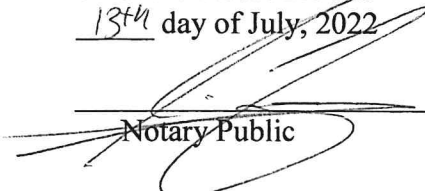
13. By November 2016, he said the cancer had won. It beat him. No more treatment. He wanted to try and enjoy whatever time he had left. It was too late for him to enjoy life, by this point. That Thanksgiving, Mario fell while trying to cook the turkey. He was so weak, even sitting down. I couldn't get him up. I called 911. He had so much depression and anxiety. He was having nightmares about dying. Every day, he would say that he didn't want to die. He didn't want to leave me. He got so frustrated and angry. Once, he started pulling out all the tubes connected to his body. There was blood everywhere. He wanted everything taken off him, and he was angry when I wouldn't do it for him. I called 911 because he was out of control. The doctors said it was time for us to consider palliative or hospice care.

14. Mario wanted to die at home. We prepared everything he would need on the first floor of our house—we got a hospital bed for him, and I put my bed next to it. I would stay next to him during the day. When I worked at night, we had a home aide take care of him. He couldn't keep food down, sometimes he would throw up on me. He'd be so embarrassed and apologetic. The day before he passed away, he told me to call the ambulance. I was standing next to him, but he couldn't see me. I put his hand in mine. He knew he was dying and needed to get to the hospital because of the pain and the bleeding.

15. It's been five years since he passed. I go through life like a zombie and wait for it to be my time to join Mario. But I try to do good, to honor his memory. My life now is about honoring Mario. I try to help others, like he would have done. Mario should be here with me.

  
PENELOPE BASTIDAS

Sworn to before me this  
13<sup>th</sup> day of July, 2022

  
Notary Public

GUILLERMO A CRUZ  
Notary Public - State of New York  
NO. 01CR6398374  
Qualified in Suffolk County  
Commission Expires Sep 30, 2023

**Sara Maria Sandstrom**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF**  
**SARA MARIA SANDSTROM**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA            )  
  : SS.:  
COUNTY OF LOS ANGELES        )

SARA MARIA SANDSTROM, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11141 Arminta Street, Sun Valley, California 91352.

2. I am currently 63 years old, having been born on August 5, 1958.

3. I am the sister of Mario Bastidas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from colon cancer on April 1, 2017, at the age of 55. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Mario and I had a close relationship. We communicated often, and I would occasionally travel from California to New York to see him. We would have great times together, reminiscing about our childhood in Ecuador. We would talk about all the hopes and dreams that we had when we arrived in the United States from Ecuador in 1999. Mario didn't have children of his own, but he was a wonderful uncle to my two daughters. He was very



loving to my children and our other brother's children. He was very giving. If my kids wanted to learn a new sport, he would always encourage them. Mario was very athletic himself and played soccer in his youth. From a young age, Mario was brave and daring. I remember when our father taught us to learn how to swim. We could barely swim, but Mario would dive off the platform into the water. He was always brave.

6. I was living in California at the time of the 9/11 attacks on the World Trade Center. I saw the attacks happening on television, and it was just unbelievable. It almost felt like watching a movie. Mario was an FDNY Lieutenant Paramedic. I know that he responded to Ground Zero right away. I remember talking to Mario after the attacks. He told me that he had to take off his protective mask to help administer first aid to victims, because it was impeding him from doing his job. He was always attentive to his work. He would often go to the hospital to check on the injured victims who he transported in the ambulance as a medic. He wanted to know how they were doing, even after his job was done. He gave his all; it was his calling to be a paramedic.

7. My sister-in-law Penelope kept me up to date on Mario's health. She noticed that he was losing his voice and that he was becoming weaker and weaker. She told me how his health was declining. It was very, very sad. He was a strong, young man, and this shouldn't have happened to him. Mario lost energy to even speak on the phone. He couldn't speak or breathe very well. He had to be taken care of like a child. It was really heartbreaking. He turned from a healthy man into someone that was helpless.

8. Financially, Mario helped support me when I needed it. I have a job, but Mario was a very giving person. Mario would do whatever he could to support his family, to make sure that they were comfortable. When he went to Ecuador, he would share his earnings with the family. When we visited him, he would take us out to the amusement park, or out to eat. We always had wonderful times together. He shared everything that he had with his family. When he became ill and passed, I no longer had his financial support.

9. Mario went through all the treatments he was supposed to have. He did chemotherapy to treat his cancer, but he couldn't be helped. He was in a lot of pain. It was really painful to see his health in decline.

10. After Mario's death, I went to his funeral to provide emotional support for his wife Penelope. It was hard to watch his wife suffer as a widow. Penelope works hard to keep his memory alive. Mario was a hero, and he lived the life of a hero. He's not here anymore, and he should be here. He was a young, healthy person. He had so much to give in life, but his life was cut short. Mario was only 55 years old when he died.

11. His death left an emptiness, a big emptiness, in our family. It's hard to fill that emptiness. I think of him every day. He was an exemplary brother and person. He was a good husband, very attentive to and supportive of his wife. He encouraged her to study to become a nurse. He was a wonderful uncle and so caring to my two daughters as well. Mario was an inspiration in my life. He told me, "Sara, everything you do in life, do your best." His calling was to help people. He loved being a paramedic, and he inspired me to be the best I can be. One of my nephews was even inspired by Mario to become an FDNY firefighter. I miss him very much, and we really loved each other. We all miss him. Our family is incomplete without him.

  
SARA MARIA SANDSTROM

Sworn to before me this  
\_\_\_\_\_ day of July, 2022

\_\_\_\_\_  
Notary Public

**See Attached Certificate**



**CALIFORNIA JURAT**

GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

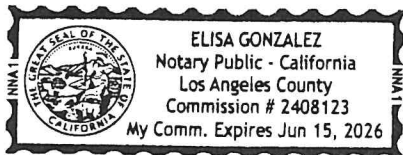
Subscribed and sworn to (or affirmed) before me on

this 19 day of July, 2022, by  
Date Month Year

(1) Sara Maria Sandstrom

(and (2) /),  
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Place Notary Seal and/or Stamp Above

Signature Elisa Gonzalez  
Signature of Notary Public

**OPTIONAL**

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: Affidavit of Sara Maria Sandstrom.

Document Date: 7-19-22 Number of Pages: 3

Signer(s) Other Than Named Above: \_\_\_\_\_

**Jose Alfredo Bastidas**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF SARA MARIA  
SANDSTROM on behalf of JOSE  
ALFREDO BASTIDAS'S  
ESTATE**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA )

: SS.:

COUNTY OF LOS ANGELES )

SARA MARIA SANDSTROM on behalf of JOSE ALFREDO BASTIDAS'S ESTATE,  
being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11141  
Arminta Street, Sun Valley, California 91352.

2 I am the daughter of Jose Alfredo Bastidas, upon whose death my claim is based.

3. I am currently 63 years old, having been born on August 5, 1958.

4. My father, Jose Alfredo Bastidas, was also a plaintiff in the within action and was  
pursuing his own solatium claim based on the illness and death of his son, Mario Bastidas.

5. Jose passed away on September 6, 2020, subsequent to the commencement of the  
within action. My family is currently working on having a representative of my father's estate  
appointed. In the meantime, I submit this affidavit on behalf of Jose's estate in connection with  
the pending motion for a default judgment and in support of his solatium claim.

6. Jose's son, Mario Bastidas, passed away from colon cancer on April 1, 2017, at

the age of 55. It was medically determined that this illness was casually connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

7. My father, Jose, had a very close relationship with his son, Mario. Since my father and Mario both lived in New York City, they were near each other geographically, which enabled them to see each other quite often. Mario and his wife, Penelope, lived in Queens, and my father and my brother, Jose, lived nearby in Brooklyn. Since my brother Jose lived with my father in Brooklyn, the family was always very close, and Mario stayed very connected with his older brother. In particular, my father would make sure to coordinate plans with Mario to celebrate birthdays, Father's Day, as well as Christmas and New Year's Day. Generally, the holidays were at my father's house so that Mario could visit and see our brother as well.

8. Unfortunately, when Mario became ill, it was difficult for my father to see him as often. Regardless, my father knew what was happening to Mario, and it was very painful for him to see Mario's health declining. Of course, it affected him a lot. My father was very strong but that was quite hard for him. I remember clearly seeing my father at Mario's funeral reception, and, while he still appeared very strong, I know he was very, very devastated. At that time, my father was in good health, but I saw that he was overwhelmed with grief to see his son being buried. In the normal course, parents don't bury their children.

9. Mario worked as a paramedic for the New York City Fire Department. On September 11, 2001, he was working as part of the rescue and recovery efforts at Ground Zero. Mario continued to work around Ground Zero for a long time, and his work as a paramedic helped save lives because he would administer first aid to victims. My father knew how dedicated Mario was and how much he loved his profession, which provided him a sense of fulfillment. He also knew that Mario was proud of his work and that being a paramedic made Mario very happy. My father was glad that Mario had experienced success in his profession, and I think it gladdened his heart to know that Mario played an important role in getting people out of danger on 9/11.

10. Since my father lived with our brother Jose, and Mario would come to visit both of them often, my father knew when Mario first started to become ill, which was around 2011. My father knew about Mario's health for his entire life, and he understood he was always a healthy child and that he led an active and healthy lifestyle as an adult. Nevertheless, my father



could see changes in Mario's health after 9/11. Indeed, after seeing what happened in the city that day and learning about Mario's exposure, he knew that Mario's health would change forever, which it did. With Mario's diagnosis of colon cancer, Mario required surgery to remove part of his colon, and my father continued to monitor his health as time went forward. This included updates my father received from Mario and his wife Penelope regarding multiple kinds of chemotherapy treatment.

11. By 2016, Mario's condition had become worse, and the cancer spread to his lymph nodes. My father would see Mario and visit with him frequently to provide comfort and show his support. However, by that time, Mario suffered from a blood clot in his legs, which created extreme swelling that made it difficult for Mario to walk. I know all of this was very difficult for my father, who had to see his son suffering through such a painful process. My father witnessed all of that and was well aware of the procedures and treatments that Mario went through to try to stave off any further spread of cancer, including everything from surgery to holistic medicine. Since my father was so strong, he wasn't the emotional type who would burst out crying. But I knew that he was struggling with everything that Mario was going through. My father understood that 9/11 changed Mario's life forever.

12. My father was incredibly hurt to see his son go through so much pain and pass away at such a young age. While my father didn't always show his emotions, he was devastated to see Mario's decline because he was always so involved in his son's life. My father raised him, provided for him, and even arranged for him to attend private school while they were still in our home country of Ecuador. The fact that Mario had always achieved incredible things, even from such a young age, made his loss that much harder for our father. For example, I remember, as children, my father taught us all to play chess and Mario became exceptional at it. When Mario came to the United States, he was of high school age and didn't even speak English. Nevertheless, he learned that the high school was hosting a chess tournament, and, with the help of some teachers, Mario enrolled in the tournament and became the champion. My father's consistent encouragement of Mario in all endeavors, and Mario's resulting achievement, made it very difficult for my father to lose Mario. My father was so deeply affected to see the son that he raised, molded, and instilled with values, become so sick, and to see him buried. It wasn't supposed to be like that at all.

13. Mario's cancer had a profound impact on my father and the entire family. You could say that Mario was the glue holding our family together. Mario didn't have any children of his own but was very close to his nephews and nieces, which my father appreciated. My father could see how generous Mario was to the nephews and nieces and was proud of him for that. Mario had learned from our father to be encouraging and supportive. As a result, Mario generously paid for the classes for Jose's children. Likewise, when my daughters would visit New York and ask to have dinner in a restaurant they saw in the movies, Mario would treat them and take them out to a movie to boot. Mario was well liked and looked up to by all of them, including Jose's two sons and two daughters. Jose's son, Jurell Bastidas, was inspired by Mario's work as a paramedic for the fire department and became a firefighter with the FDNY. He wanted to follow in Mario's footsteps so that he could help others.

14. My father loved Mario very much. He would tell me how he missed him and was saddened to see Mario suffer the way he did. To see his own strong boy being defeated and lose his independence was devastating. To think that all this misery is attributable to that horrible day, that horrible time for everyone, is unimaginable.

  
SARA MARIA SANDSTROM on behalf of  
JOSE ALFREDO BASTIDAS'S ESTATE

Sworn to before me this  
\_\_\_\_\_ day of July, 2022

\_\_\_\_\_  
Notary Public

*See notary attached*



**CALIFORNIA JURAT**

**GOVERNMENT CODE § 8202**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on

this 4<sup>th</sup> day of August, 20 22, by  
Date Month Year

(1) Sara Maria Sandstrom

(and (2) \_\_\_\_\_),  
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to  
be the person(s) who appeared before me.

Signature. Helen Bekian  
Signature of Notary Public

Place Notary Seal and/or Stamp Above



**OPTIONAL**

Completing this information can deter alteration of the document or  
fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

**Chase Charles Brenneisen**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
CHASE CHARLES BRENNEISEN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF SOUTH CAROLINA )

: SS.:

COUNTY OF RICHLAND )

CHASE CHARLES BRENNEISEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 137 Roper Pond Circle Columbia, South Carolina 29206.

2. I am currently 39 years old, having been born on January 22, 1983.

3. I am the son of Ronald Robert Brenneisen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on September 12, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a really close relationship. We would go fishing on the weekends, have barbecues, and go to church on Sundays. Whenever I had any questions or doubts in life, my father would give me advice. He would never steer me wrong. We would talk about relationships, careers, everything in life. I went to college and worked in construction after. I was a little uncertain in life, so my father guided me towards a career in truck driving. I got my commercial driver's license and have been driving trucks ever since. I'm grateful for my

father's guidance. We were very close.

6. My father was with the FDNY for twenty-five years. He could've retired after twenty years, but he stayed on for an extra five. My father loved the brotherhood of the Fire Department. After 9/11, he told me he had never seen anything like that in his life. The steel was all mangled. He spent hundreds of hours working in the pit. He told me it was like a war zone. The World Trade Center was a complete mess, and he spent months looking for survivors. He spent hundreds of hours breathing in the dust at Ground Zero.

7. After 9/11, my father started to have lung issues. Only one of his lungs was really working. My father would go every year to the FDNY doctor for a checkup. About a month before he found out he had cancer in 2014, he wasn't feeling himself. He didn't look right. He thought he might have had ulcers, as his stomach was really bothering him. One day, he just couldn't deal with the pain. He found out he had the cancer and it all deteriorated so quickly from there. It happened really fast.

8. The day he went to the hospital, he had so much fluid in his legs that they were triple the normal size. He spent a few days in the hospital and went to hospice. It wasn't even a full week until he died. He and his wife made the decision to go to hospice. I know these 9/11-illnesses happened to a lot of firefighters, but it was scary to see it happen to my father. There wasn't much time.

9. His wife had power of attorney over him, but she didn't tell my sister and me that she did. She let our father stay in hospice until his final days. It really haunts our family to this day the way his wife had control over his healthcare before he died. My sister and I wanted to send him to a cancer center in Orlando. By the time the cancer center ambulance came, my father was so weakened that he couldn't even get into the ambulance.

10. I had my first daughter in August 2014, when my dad first had issues with the ulcers. But now, my daughters don't know anything about my father. They ask questions about him. They're young kids, so they don't fully understand, but I try to explain 9/11 to them and what happened on that day. I live close to the fire station, and every day I hear firetrucks go by. I tear up whenever I hear a fire engine siren. It's hard to open up about my father's death. His death will be eight years ago this year. It doesn't get any better over time.

11. My father was the kind of guy who would help anyone. When I finished college, my father paid off my college tuition without me asking. He was always doing great things. We

never had to ask for anything. My father was so giving. He helped me, my sister, anyone who needed it. He was a really great guy and an awesome father. Every year, when my father's birthday comes around, or the holidays, or even the anniversary of 9/11, I try to talk to my children about him. His premature death is an unfortunate consequence that we have to deal with for our whole lives.

Chase C Brenneisen  
CHASE CHARLES BRENNEISEN

Sworn to before me this  
15 day of July, 2022

Wayne Jefferson  
Notary Public



**Jessyca Brenneisen**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

Plaintiffs,

**AFFIDAVIT OF  
JESSYCA BRENNEISEN**

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF FLORIDA       )  
                                  : SS.:  
COUNTY OF OSCEOLA    )

JESSYCA BRENNEISEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2268 Jessica Lane, Kissimmee, Florida 34744.
2. I am currently 44 years old, having been born on April 20, 1978.
3. I am the daughter of Ronald Robert Brenneisen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from pancreatic cancer on September 12, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My dad was definitely a big part of our lives, especially when I had my son. I was a single mother, and even before having my son, my dad was the first person to tell me he knew I would be okay. My father supported me in every way possible when I became a single mother. When I had my son, that was the greatest blessing in our family. My father would come home



from work, and the first thing he wanted to do was see my son, hold him, and play with him. Fast forward—now, my son has just graduated high school. I asked my son how he felt after he graduated, and he said, “I wish Poppy was there.” My father passed away in 2014, but no matter what, I could never get over this loss. If I had any question about anything, my father was my go-to. Sometimes, I pick up the phone and go to call my dad, forgetting that he passed away. He was a big part of our lives. Not having him around just really hurts.

6. My father worked as an FDNY fireman. I was living with my brother Chase and my son at the time of the September 11<sup>th</sup> attacks. My son was born in August 2001, right before 9/11. When the World Trade Center attacks first happened, I thought, “Oh my god, my dad.” The cellphone lines were all down. All I could do was pray. He finally called me at 9:00 p.m. I had never heard my dad sound so scared. I could hear that fear in his voice. He said, “Jessie, it’s like a war zone.” He told me that people were jumping from the towers. He said one of the guys in the Fire Department was a rookie and that it was too emotionally scarring for him to see. He told me to kiss my son for him, and he told me not to worry. It was a relief to hear my father’s voice, but the whole time I was worrying. I know my father was working for several months at the World Trade Center site after that.

7. My father would come home for dinner and tell me that he and the other firemen knew what they were breathing in. He told me he thought that his exposure at Ground Zero was going to knock ten years off his life. He had friends who were spitting out dust as they worked on the site. My father moved to Florida shortly after 9/11. I moved to Florida at the end of 2005. My father convinced me to move down here, as he knew the cost of living would be cheaper. We lived near each other. Years later, I started to notice that my dad had lost a bit of weight and didn’t have much of an appetite. He told me he wasn’t feeling well, and he missed the birthday party for both of my kids in August 2014. I thought maybe he had the flu.

8. My brother called me up crying, on September 6<sup>th</sup>, 2014, telling me our father had stage IV cancer. It was so traumatic, the chain of events that occurred after that day. I thank God that my father’s colleagues in the FDNY guided me in helping get my father healthcare. I remember, everything was “go, go, go.” He was put in hospice by his wife. I asked my dad, what do you want to do? He said, “Get me out of here.” He didn’t want to be in hospice. I called all the cancer treatment centers in Florida, and they were all full. It was so terrible. I called one



last place in Orlando and said, "Please, my father was a fireman on 9/11. His last wish is to fight this cancer. I'll do anything to get him in." So, they got him in.

9. It was September 11<sup>th</sup>, 2014, when they were going to pick him up from hospice. I remember the last night in hospice with my dad and brother. I drove up to stay overnight with my father in hospice. I couldn't sleep, so that night I started researching about the effects of 9/11. I never realized so many people were getting sick from 9/11 exposure. At 4:00 a.m., the hospice nurse gave him morphine, and he didn't want it. I was really scared. When the ambulance came in the morning to take my dad to the cancer center, he couldn't get himself out of bed. The nurses said he was so weak that he shouldn't go to a cancer treatment center. The nurse was fighting me. I knew my dad was going to die but he didn't want to die in hospice. He didn't want to give up, he wanted to fight. But the nurses wouldn't let us leave. It just added to the pain. I felt like I failed, because I couldn't get my father to a cancer treatment center. I prayed, I said, "Don't die today, Dad." My dad ended up dying in hospice the next morning.

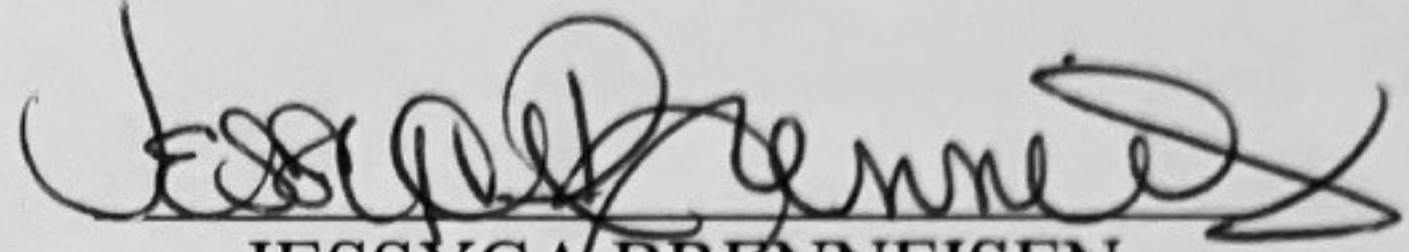
10. Losing a parent suddenly—there's no warning. It's like getting hit by a truck. You wake up and everything changes. I have to talk about my dad, I talk about him to my children. We still have pictures of him in the house. I have to feel like he's around, like he's still with us, in order to heal. When I would get emotional, my father was always there to comfort me. I finally bought my first house, and my father isn't here to see it. My daughter is thirteen, and she didn't get to know my father. She was only six years old when he died. It's a huge, huge loss. I'll never get over it, I'm just learning to live without my dad.

11. My dad was type A. He loved cars, he loved painting. He would paint for his children. He would help me fix my car. My dad was very handy, and I know he would've helped me fix the house. He would've been there for every milestone. I know how much he would've loved to see my son graduate high school. He was so giving. He was always there.

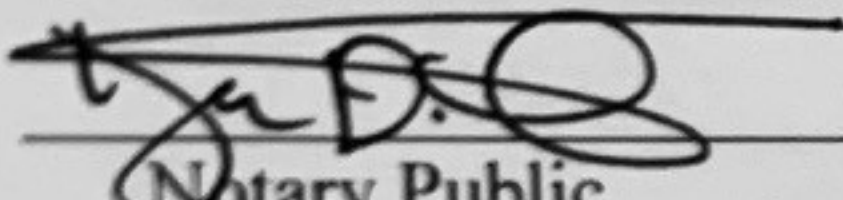
13. What took place on September 11<sup>th</sup> changed and impacted our lives forever. It's a forever thing. They put my father's name up on the memorial in the FDNY Headquarters in Brooklyn. When I went to visit it for the unveiling, a newspaper was there reporting. The reporters asked me, "If your father knew [that he was going to pass from a 9/11-related illness], would he have still done it?" I said, "yeah, absolutely." My father said he still went to work at Ground Zero even when he knew it was going to knock ten years off his life. He knew what he

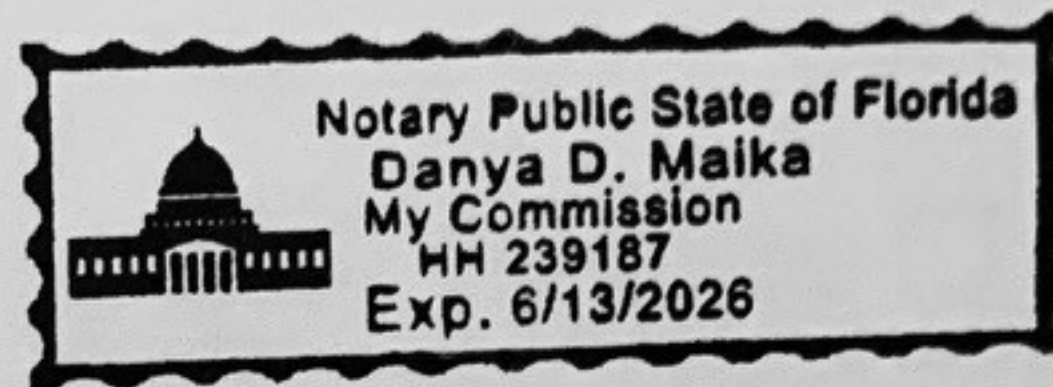


needed to do. No compromise. He always did his job, and more. He's an amazing person who will always live on through his children and grandchildren. There's nothing that could ever replace him.

  
JESSYCA BRENNER  
Personally Known

Sworn to before me this  
26 day of July, 2022

  
Notary Public



**Dong Xi Cao**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
DONG XI CAO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF KINGS     )

DONG XI CAO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 218A North Henry Street, Brooklyn, New York 11222.

2. I am currently 49 years old, having been born on August 29, 1972.

3. I am the brother of Miao Ling Cao, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from metastatic breast cancer on January 2, 2015, at 45 years old. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. It wasn't until after my sister passed that I realized she cared for my siblings and me like a second mother. She was always there for me. She was always willing to help me out in any way. During my college years, she helped me out financially. Once I got a job with Merrill Lynch, she got me a suit. She taught me how to iron that suit and how to look professional. She would often watch my daughters and set up playdates for them with her own



daughters. I remember one day she had taken all of the girls to the mall. The girls ended up playing near a fountain and eventually in the fountain. Needless to say, they were soaked. My sister bought all the girls dresses so that they didn't have to walk around wet the rest of the day. She always did sweet and generous things like this.

6. At the time of the attacks on 9/11, my sister was working close to 1 New York Plaza. She saw many horrors on that day. She witnessed the first plane crash into the towers. As she tried to escape from the World Trade Center site, she witnessed more horrors still. She saw people jumping from the towers to their deaths. She walked across the Brooklyn Bridge as the events transpired. I was living in Brooklyn with my wife at the time and met her once she crossed the bridge. Although the events she witnessed shook her, she returned to work once the air was declared safe to breath. She would continue working from that office for another four years.

7. In 2011, I learned of my sister's diagnosis. I got a phone call from her telling me that she had cancer. I was devastated. The news brought me to tears. From there, her treatments began quickly. I drove her to a couple of her chemotherapy treatments. I took her to some doctor's appointments as well. I was raising five kids at the time of her surgery so I could not be there for her as much as I wanted. I still made trips to visit her as much as I could. Despite her mental fortitude, I could still see she was in a lot of pain. There were times I would have to pick up pain medication for her to help her out.

8. One of my biggest regrets in life is that I never became as close with my sister as I could have been. After her passing, I realized how important she was to me. She was always there for me to support me in every way she could. I miss her greatly. At the end, she was in hospice and under a lot of morphine. The doctors told me she would be unresponsive, but I wanted to see her any way. I was trying my best to comfort her by rubbing her shoulder, and she reached out to me. It seemed she had a moment of consciousness, and I blurted out that I loved her. It was the first time I told her I loved her. I knew it would be my last goodbye. I let her know that I loved her.

9. It all has caused such a profound sadness in me. I never thought something like this would happen for us. Looking back, I wish I could have spent more time with my sister. I do my best to look out for her daughter now. Her daughter is close with my girls, and so I have

an open-door policy for her. She is always allowed over and to sleep over any time. I try not to dwell on my sister's passing, but it is incredibly unfortunate she passed away at such a young age.

  
DONG XI CAO

VYGIS CHARASKA  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01CH6387735  
Qualified in Queens County  
My Commission Expires 02-25-2023

Sworn to before me this  
22 day of July, 2022

  
Notary Public



**Ze Ci Cao**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ZE XI CAO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF CALIFORNIA    )  
                                  : SS.:  
COUNTY OF ORANGE     )

ZE XI CAO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18972 Santa Clara Circle, Fountain Valley, California 92708.

2. I am currently 47 years old, having been born on July 23, 1974.

3. I am the brother of Miao Ling Cao, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from breast cancer on January 2, 2015, at 45 years old. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My family and I moved to the U.S. in 1982. As immigrants, my parents had to work hard at blue collar jobs. This caused my sister to step up and help co-parent my siblings and me. She became like my second mother. We had a tremendous relationship and were very close. I am the youngest of my siblings and really looked up to her. She did everything for us that was needed when our parents could not. She cooked, cleaned, and helped us all with our

schoolwork. She always took charge. As we grew older, she continued to be there for me and supported me in all my endeavors. When I developed an interest in tennis, she went out of her way to buy me a racket. During college, I fell ill with stomach pains that forced me to take some time off from college. She was there for me and provided me with as much care as she could.

6. At the time of the attacks on 9/11, my sister was working close to 1 New York Plaza. She saw many horrors on that day. She witnessed the first plane crash into the towers. As she tried to escape from the World Trade Center site, she witnessed more horrors still. She saw people jumping from the towers to their deaths. She walked across the Brooklyn Bridge as the events transpired and met with my brother once she crossed the bridge. Although the events she witnessed shook her, she returned to work once the air was declared safe to breath. She would continue working from that office for another four years.

7. When my sister began to feel ill, she made an appointment to try to get some testing done. She was nervous about her appointment and invited me along with her. I was there when she received the devastating diagnosis from her doctor. She had stage IV breast cancer. She put on a brave face and fought tremendously through it. Her cancer even went into remission for a short while before we found out it had moved to her neck and required surgery.

8. I lived in New Jersey during the course of my sister's illness and did my best to support and be with her as much as I could. She lived alone with her daughter, so it was important to me to support them as best I could. She often fell ill because of her chemotherapy and radiation. There came a point where I needed to stay with my sister due to her body's reaction to the chemotherapy and the spreading of her cancer. I would stay with her during the week and return home to New Jersey on the weekends. This went on for months until we found out her cancer had progressed. Eventually, her cancer spread to her bones, and she was prescribed in-home hospice care.

9. Watching my sister go through her illness was devastating. She was always so bubbly and full of life. Seeing her suffer through it all was hard. She was always the rock of the family. She was always there to care and give advice. It was hard to see her being the one who needed help. I felt a great sadness watching my sister come to grips with her mortality. I felt privileged to be the one she looked toward to provide her with care. Yet, it was so disheartening to see a healthy, vibrant, and life loving person fade. I miss my sister terribly.



State of Nevada

County of Clark

Subscribed and sworn to (or affirmed) before me

on this 11<sup>th</sup> day of July, 2022

by Ze Xi Cao

Toynet M. Sharp  
Notary Signature

Ze Xi Cao  
ZE XI CAO

Sworn to before me this

11<sup>th</sup> day of July, 2022

Toynet M. Sharp  
Notary Public

